

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**GEORGE BOYD, *et al.*,
Individually and on behalf of
all others similarly situated,**

Plaintiff,

v.

**LAW OFFICES OF
SHAPIRO, BROWN & ALT, LLP, *et al.*,**

Defendants.

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Civil Action No: 3:12-cv-700-REP

DECLARATION OF LINDSEY C. KELLY

I, Lindsey C. Kelly, declare under penalty of perjury, on this 20th day of December, 2012, that I have personal knowledge of the following matters and that they are true and correct to the best of my knowledge:

1. My name is Lindsey C. Kelly. I am a resident of Carrollton, Virginia. I am above the age of eighteen and am competent to testify to all matters contained herein.

2. I am currently employed by Shapiro Brown & Alt, LLP. My job responsibilities include, but are not limited to, review of pre-sale demand letters and files, communication with clients, conducting sales, and supervising debt dispute correspondence, title curative and incoming litigated matters.

3. As I understand it, the Complaint filed in this case makes allegations that the institutional practices of Shapiro Brown & Alt, LLP are non-compliant with the FDCPA and Virginia state law. These claims include allegations that that correspondence sent by Shapiro Brown & Alt, LLP to borrowers violated the FDCPA and Virginia law.

4. To the best of my knowledge, all correspondence to borrowers was sent from Virginia Beach, Virginia, Fairfax County, Virginia, or Prince William County, Virginia.

5. From 2010 through 2012, during the time frames alleged in the Complaint, I was employed by Shapiro Brown & Alt, LLP, in the Virginia Beach office, as an attorney, and at all relevant times during this time period. I have been an officer of Professional Foreclosure Corporation of Virginia.

6. I have first-hand knowledge concerning the communication sent to debtors by Shapiro Brown & Alt, LLP.

7. The continued litigation of this case in the Richmond Division would create great hardships and inconveniences for me.

8. I have four children under the age of six who I am responsible for; they are in full-time childcare which is not available outside business hours and with the exception of my husband, who also works full-time. I do not have family currently living in the area.

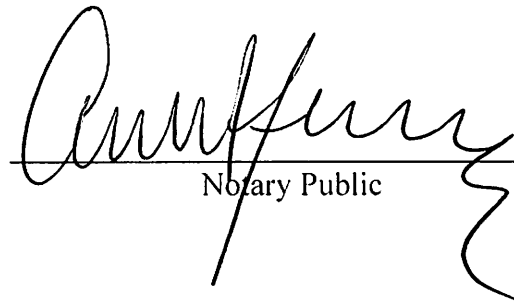
9. In addition, my job responsibilities make it difficult for me to leave the office in the middle of a work day. I supervise debt dispute and litigation threat correspondence, along with newly filed litigation against our clients, which is often received last-minute before a sale and needs to be addressed immediately. Litigation-related referrals from our clients often are sent directly to me and require detailed review and response within one business day. Additionally, I call sales and sometimes attend hearings.

10. It will be extremely inconvenient and create undue hardship for me to leave my home and current job to travel to Richmond to attend pretrial and trial proceedings in this case.



COMMONWEALTH OF VIRGINIA.
CITY/COUNTY OF VA Beh, to wit:

The above Declaration was subscribed and sworn to (or affirmed) before me on this 20
day of December, 2012, by Lindsey Kelly proved to me on the basis of satisfactory evidence to be
the person who appeared before me.



Notary Public

My Commission Expires: 11/30/15

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